

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE 650 FIFTH AVENUE AND
RELATED PROPERTIES

Case No.: 08-CV-10934 (LAP)

MOTION FOR FINAL DISMISSAL WITH PREJUDICE

COME NOW, the Withdrawing Havlish Judgment Creditors, by and through undersigned counsel and respectfully request this Honorable Court enter an Order dismissing with prejudice the claims for the Withdrawing Havlish Judgment Creditors who are identified on the attached **Exhibit A**. As grounds for this motion, the Withdrawing Havlish Judgment Creditors state as follows:

1. The Withdrawing Havlish Judgment Creditors identified on **Exhibit A** are affirmatively withdrawing from the above-captioned proceedings (“650 proceedings”) by agreement with the U. S. Victims of State Sponsored Terrorism Fund (“USVSST Fund”) so that they may receive their allocated conditional payments from the USVSST Fund and to be eligible to participate in future USVSST Fund distributions.

2. Said Withdrawing Havlish Judgment Creditors affirm that they have not received and do not intend to receive any funds in the 650 proceedings.

3. Said Withdrawing Havlish Judgment Creditors affirm that, if they do inadvertently receive any funds in the 650 proceedings, those funds will be promptly returned to the payor.

WHEREFORE, the Withdrawing Havlish Judgment Creditors respectfully request this Honorable Court to enter a final dismissal with prejudice dismissing all claims in the 650 proceedings for the Withdrawing Havlish Judgment Creditors identified on **Exhibit A**. The claims of the Havlish Judgment Creditors in the 650 proceedings who are not listed on Exhibit A are unaffected by this Motion.

Dated: April 28, 2025

Respectfully submitted,

/s/ Dennis G. Pantazis

Dennis G. Pantazis (AL Bar No. ASB-2216-A59D)
WIGGINS CHILDS PANTAZIS (*Lead Counsel*)
FISHER GOLDFARB LLC
The Kress Building
301 19th Street North
Birmingham, Alabama 35203
(205) 314-0500

Timothy B. Fleming (DC Bar No. 351114)
WIGGINS CHILDS PANTAZIS
FISHER GOLDFARB PLLC
2202 18th Street NW, #110
Washington, D.C. 20009-1813
Washington, D.C. 20036
(202) 467-4489

Richard D. Hailey (IN Bar No. 7375-49)
Mary Beth Ramey (IN Bar No. 5876-49)
RAMEY & HAILEY
3905 Vincennes Road #303
Indianapolis, IN 46268
(317) 582-0000

Robert M. Foote (IL Bar No. 03124325)
FOOTE, MIELKE, CHAVEZ
& O'NEIL, LLC
10 West State Street, Suite 200
Geneva, IL 60134
(630) 232-7450

*Attorneys for the Withdrawing Havlish
Judgment Creditors*